

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE and JOHN DOES 1-10.

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP, INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 1:07 Civ. 9790 (SHS) (DCF)

[ECF CASE](#)

Civil Action No.: 1:07 Civ. 10294 (DC) (GWG)

[ECF CASE](#)

Civil Action No.: 1:07 Civ. 10341 (UA)

[ECF CASE](#)

ANTON K. RAPPOLD, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN and JANE DOES 1-10,

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

-against-

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401 (K) PLAN),

Defendants.

Civil Action No.: 1:07 Civ. 10396 (UA)

[ECF CASE](#)

Civil Action No.: 1:07 Civ. 10442 (UA)

[ECF CASE](#)

STEPHAN FIORINO, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

JAMES BOLLA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 1:07 Civ. 10458 (UA)

ECF CASE

Civil Action No.: 1:07 Civ. 10461 (UA)

ECF CASE

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly situated,

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNÁNDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, SANDFORD I. WEILL,

Defendants.

Civil Action No.: 1:07 Civ.  
10472 (UA)

ECF CASE

**RESPONSE TO THE *GRAY AND TADROS* PLAINTIFFS' MOTION FOR  
(1) CONSOLIDATION, (2) APPOINTMENT OF LEAD PLAINTIFFS AND  
LEADERSHIP STRUCTURE, AND (3) ENTRY OF [PROPOSED] PRETRIAL  
ORDER NO. 1 ON BEHALF OF PLAINTIFF ANTON K. RAPPOLD**

Zwerling, Schachter & Zwerling LLP, counsel for plaintiff Anton K. Rappold in the above-caption action entitled *Anton K. Rappold v. Citigroup Inc., et al.* (Civil Action No. 07 Civ. 10396), hereby submits this response to the *Gray and Tadros* Plaintiffs' Motion for (1) Consolidation, (2) Appointment of Lead Plaintiffs and Leadership Structure, and (3) Entry of [Proposed] Pretrial Order No. 1 pending before the Court (the "Motion").

Plaintiff Anton K. Rappold does not oppose the Motion.

Dated: December 10, 2007

Respectfully Submitted,

**ZWERLING, SCHACHTER  
& ZWERLING, LLP**

/s Susan Salvetti  
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*Attorneys for Anton K. Rappold*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No.: 1:07 Civ. 9790  
(SHS) (DCF)

[ECF CASE](#)

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No.: 1:07 Civ. 10294 (DC) (GWG)

[ECF CASE](#)

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE and JOHN DOES 1-10.

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No.: 1:07 Civ. 10341 (UA)

[ECF CASE](#)

CITIGROUP, INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

ANTON K. RAPPOLD, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN and JANE DOES 1-10,

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

-against-

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401 (K) PLAN),

Defendants.

Civil Action No.: 1:07 Civ. 10396 (UA)

[ECF CASE](#)

Civil Action No.: 1:07 Civ. 10442 (UA)

[ECF CASE](#)

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STEPHAN FIORINO, individually and on behalf of all others similarly situated,

Plaintiff,

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CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

---

Defendants.

JAMES BOLLA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

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Defendants.

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Civil Action No.: 1:07 Civ. 10458 (UA)

[ECF CASE](#)

Civil Action No.: 1:07 Civ. 10461 (UA)

[ECF CASE](#)

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly situated,

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNÁNDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, SANDFORD I. WEILL,

Defendants.

**CERTIFICATE OF SERVICE**

I, Susan Salvetti, hereby certify that on December 10, 2007 I caused to be electronically filed, true and correct copies of the foregoing documents:

- Response to the *Gray and Tadros* Plaintiffs' Motion for (1) Consolidation, (2) Appointment of Lead Plaintiffs and Leadership Structure, and (3) Entry of [Proposed] Pretrial Order No. 1 on Behalf of Plaintiff Anton K. Rappold, and
- this Certificate of Service

with the Clerk of the Court using the ECF system, which will electronically notify the following ECF participants in the above-captioned cases:

Civil Action No.: 1:07 Civ. 10472 (UA)

**ECF CASE**

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I further certify that I have caused true and correct copies of the foregoing documents to be served by U.S. Mail to the following non-ECF participants:

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Dated: December 10, 2007

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Susan Salvetti (SS 1508)